

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No: 1:23-cv-00957-CCE-LPA**

**BRAHMAJOTHI VASUDEVAN  
MULUGU,**

**Plaintiff,**

**v.**

**DUKE UNIVERSITY SCHOOL OF  
MEDICINE, et al.**

**Defendants.**

**DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and LR 56.1(a), Duke University (“Duke”), Donald McDonnell (“McDonnell”), Mary Klotman (“Klotman”), and Sharon Dowell-Newton (“Dowell-Newton”) (together, “Defendants”), by and through undersigned counsel, hereby move this Court of an order of summary judgment dismissing Plaintiff Brahmajothi Vasudevan Mulugu’s (“Plaintiff”) Amended Complaint in its entirety. Plaintiff cannot show a genuine dispute of material fact with respect to any of Plaintiff’s claims and Defendants are therefore entitled to judgment as a matter of law. In support of this Motion, Defendants rely upon their Memorandum of Law in Support of Motion for Summary Judgment and the exhibits attached thereto.

WHEREFORE, Defendants respectfully request that the Court grant summary judgment in their favor on Plaintiff’s claims.

Respectfully submitted this 30th day of June, 2025.

/s/ Tory Ian Summey

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**CERTIFICATE OF SERVICE**

I hereby certify that on this date the foregoing “***DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT***” was electronically filed with the Clerk of Court using the CM/ECF system and served upon the *Pro Se* Plaintiff via the Court’s electronic case filing system and pursuant to Pro Se Authorization Form to Receive Documents Electronically (Doc. No. 3).

This 30th day of June, 2025.

/s/ Tory Ian Summey

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